

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION

ORDER NO. 85-75

WASTE DISCHARGE REQUIREMENTS FOR:

U. S. DEPARTMENT OF INTERIOR (NATIONAL PARK SERVICE),  
GOLDEN GATE NATIONAL RECREATION AREA (RODEO LAGOON),  
MARIN COUNTY

The California Regional Water Quality Control Board, San Francisco Bay Region (the Board) finds that:

1. The Department of the Interior, National Park Service (the discharger) manages the Marin Headlands Unit of the Golden Gate Recreational Area (GGNRA). The discharger submitted a Report of Waste Discharge dated January 7, 1985, and additional information dated April 16, 1985, for the discharge of domestic waste from facilities at Rodeo Lagoon in the Marin Headlands Unit of GGNRA, Marin County.
2. Sewage collection and treatment facilities at Rodeo Lagoon serve roughly 100 equivalent residents at Fort Cronkhite and Fort Barry, two former U. S. Army bases. The two forts house several public as well as private non-profit agencies: National Park Service headquarters, Golden Gate Energy Center, Yosemite Institute, World College West, Marine Mammal Center, YMCA, and a youth hostel. The Rodeo Lagoon facilities also serve about 1,000 day visitors per day (annual average), many of whom use chemical toilets in the remote portions of the Marin Headlands area.
3. Rodeo Lagoon wastewater facilities consist of a collection system feeding into two large septic tanks, with sewer lines to a subsurface leachfield in the beach separating Rodeo Lagoon from the ocean at Rodeo Cove (see Attachment A). The Fort Barry septic tank has a capacity of 105,000 gallons and a 2,000 foot line to the leachfield. The Fort Cronkhite septic tank has a 20,000 gallon capacity and a 400 foot connector to the leachfield. Each septic tank has its own leachfield with a single distribution line; the two lines have a combined length of 1,100 feet.

4. The existing system receives wastewater flows of approximately 20,000 gallons per day (gpd) (annual average) and 800,000 gpd (peak wet weather). Peak flows were much higher in the past, before an infiltration/inflow (I/I) repair project was completed. A second I/I project was recently completed, so that peak wet weather flow is probably somewhat lower now. A 1977 study described wastewater characteristics at Rodeo Lagoon:

|                  |          |
|------------------|----------|
| BOD (5-day)      | 285 mg/l |
| Suspended Solids | 315 mg/l |
| Nitrogen         | 35 mg/l  |
| Phosphorus       | 10 mg/l  |

5. The discharger is currently subject to Waste Discharge Requirements contained in Resolution 312, adopted on July 16, 1959. The resolution provides requirements for a subsurface leachfield similar to the one currently operated by the discharger.
6. The Board adopted a revised Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) on July 21, 1982. The Basin Plan prohibits the discharge of raw sewage or any waste failing to meet waste discharge requirements to any waters of the Basin.
7. The Basin Plan identifies the following beneficial uses of Rodeo Lagoon and the Pacific Ocean:

Industrial service supply (Pacific)  
Navigation (Pacific)  
Water-contact and non-contact recreation (both)  
Commercial and sport fishing (Pacific)  
Preservation of Areas of Special Biological Significance  
(Pacific)  
Wildlife habitat (both)  
Preservation of rare and endangered species (Pacific)  
Marine habitat (Pacific)  
Fish migration (Pacific)  
Fish spawning (both)  
Shellfish harvesting (Pacific)  
Estuarine habitat (Pacific)

8. The existing Rodeo Lagoon system has violated the terms of its Waste Discharge Requirements on many occasions in the past. The 1977 study of the Marin Headlands sewerage system reports serious pollution problems in the recreational waters of Rodeo Lagoon, Rodeo Lake and the beach area. Hydraulic overloading of the septic tanks and leachfield are blamed for pre-1977 pollution. The discharger has done I/I rehabilitation work since then. However, a March 1983 self-monitoring report noted hydraulic overloading at both septic tanks during wet weather, with resulting pollution of adjacent waters. The 1983 report also documents a major leachfield failure resulting from winter storms, which eroded Rodeo Beach and carried away 200 to 300 feet of the Fort Barry leach line. A similar failure in the future is possible due to the transitory nature of the beach in which the leachfield is located. In addition, increased summer usage by park visitors will increase peak summer flows significantly, according to GGNRA projections.

9. The discharger, in cooperation with the U. S. Army, proposes to construct a sewer connection to the Sausalito-Marin City sewage treatment plant in Sausalito and abandon the beach leachfield. The project involves building 4 new pump stations and about 17,000 linear feet of force mains and gravity sewer, and reconstructing an existing pump station at Fort Baker (see Attachment B). Both East and West Fort Baker are already connected to the Sausalito plant. Design flows from Forts Cronkhite and Barry are:

|                    |             |
|--------------------|-------------|
| Average daily flow | 74,000 GPD  |
| Peak flow          | 302,000 GPD |

10. The discharger has completed design work for the above project and has requested project funding. No funding or construction schedule has been set, however.

11. Adoption of revised waste discharge requirements is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, Section 2100 et. seq.) pursuant to Section 13389 of the California Water Code.

12. The Board has notified the discharger and interested agencies and persons of its intent to prescribe waste discharge requirements for the discharge and has provided them with the opportunity for a public hearing and an opportunity to submit their written views and recommendations.

13. The Board, in a properly-noticed public meeting, heard and considered all comments pertaining to the discharge.

IT IS HEREBY ORDERED that the U. S. Department of Interior in order to meet the provisions contained in Division 7 of the California Water Code and regulations adopted thereunder, shall comply with the following:

A. Discharge Specifications

1. The treatment or disposal of waste shall not create a nuisance as defined in Section 13050(m) of the California Water Code.
2. The disposal of waste shall not cause degradation of ground or surface water suitable for domestic water supply or cause an increase in any quality parameter that would impair beneficial uses of said waters.

B. Prohibitions

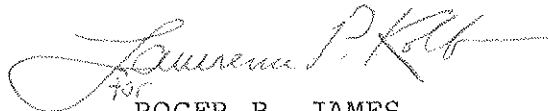
1. Wastewater shall not be discharged to waters of the State, via either surface flow or surfacing after percolation.
2. Prior to completion of the connection to the Sausalito-Marin City plant, the volume of wastewater discharged to the Fort Barry leachfield shall not exceed 50,000 GPD and to the Fort Cronkhite leachfield shall not exceed 10,000 GPD.

C. Provisions

1. On or before November 1, 1985, the discharger shall submit to the Executive Officer for approval, a timely yet reasonable schedule for construction of the sewer connection to the Sausalito-Marin City sewage treatment plant and abandonment of the beach leachfield system.
2. This Order superceded Resolution 312, which is hereby rescinded.
3. The discharger shall file with the Regional Board a report of waste discharge at least 120 days before making any material change or proposed change in the character, location or volume of the discharge.

4. The discharger shall permit the Board or its authorized representative in accordance with California Water Code Section 13267(c):
  - a. Entry upon premises in which an effluent source is located or in which any required records are kept;
  - b. Access to copy any records required to be kept under terms and conditions of this Order;
  - c. Inspection of monitoring equipment or records; and
  - d. Sampling of any discharge.
5. The discharger shall comply with the self-monitoring program as adopted by this Board and as may be amended by the Executive Officer.
6. This Board will review this Order periodically and may revise the requirements when necessary.

I, Roger B. James, Executive Officer, do hereby certify the foregoing is a full, true, and correct copy of an order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on June 19, 1985.

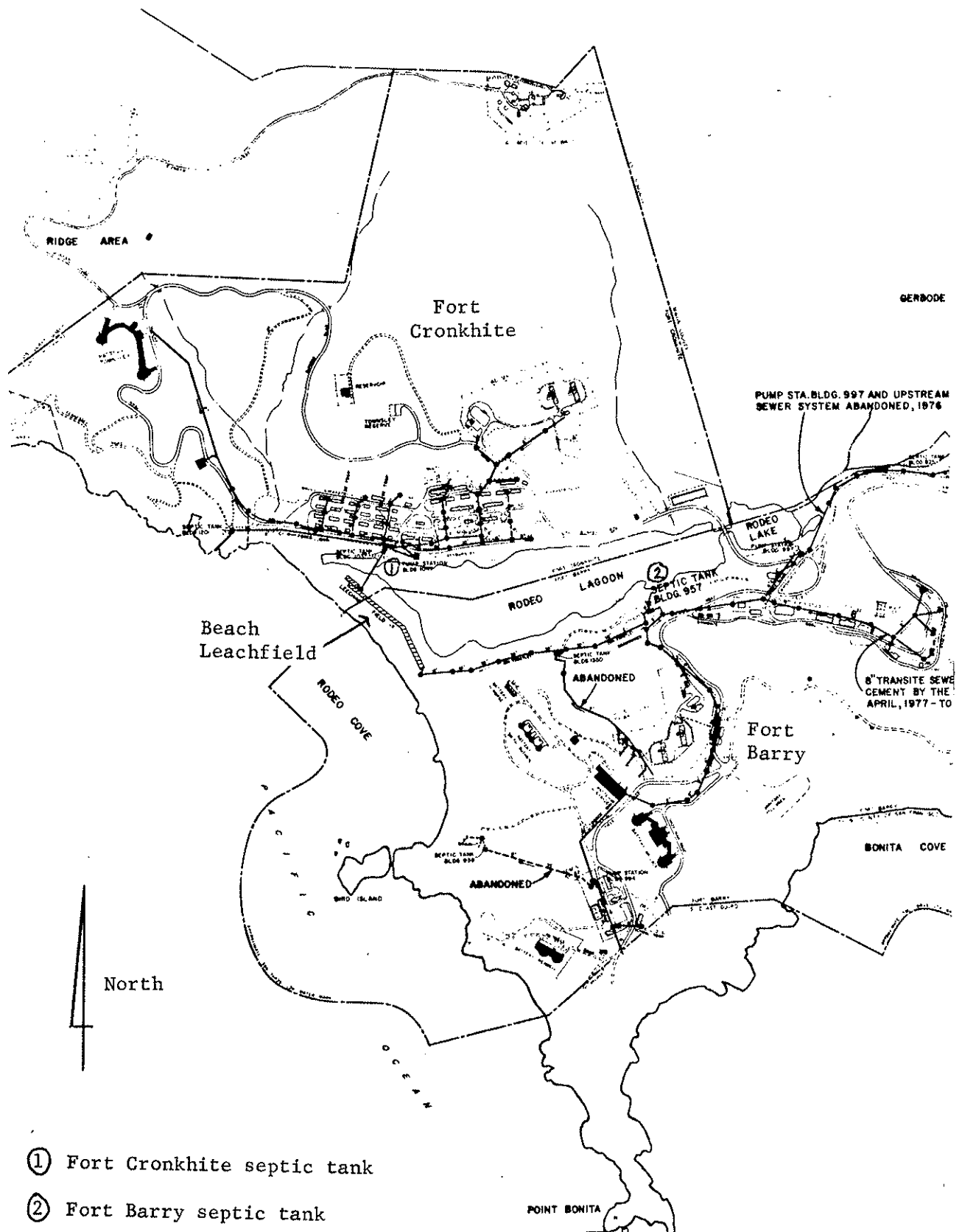
A handwritten signature in cursive script, appearing to read "Roger B. James", with a small "for" written below the signature.

ROGER B. JAMES  
Executive Officer

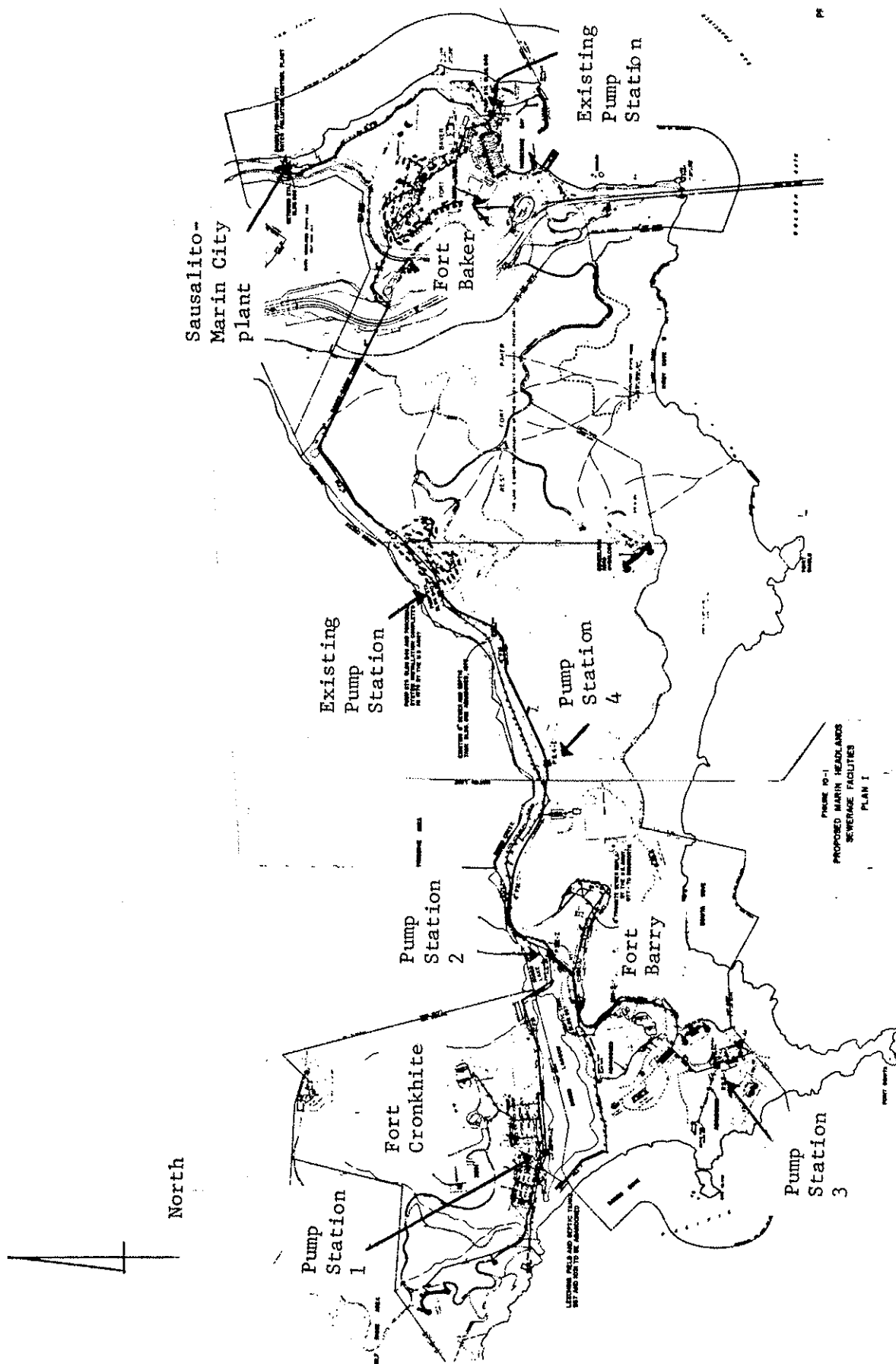
Attachment:

Self-Monitoring Program  
Map A - Existing Facilities  
Map B - Proposed Connection

MAP A: EXISTING FACILITIES



# MAP B: PROPOSED CONNECTION



CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION

SELF-MONITORING PROGRAM  
FOR

U. S. Department of Interior

Golden Gate National Recreation Area - Rodeo

Lagoon

Marin County

ORDER NO. 85-75

CONSISTS OF

PART A

## PART A

### I. GENERAL

Reporting responsibilities of waste dischargers are specified in Sections 13225(a), 13267(b), 13268, 13383 and 13387(b) of the California Water Code and this Regional Board's Resolution No. 73-16.

The principal purposes of a monitoring program by a waste discharger are:

1. To document compliance with waste discharge requirements and prohibitions established by the Regional Board.
2. To facilitate self-policing by the waste discharger in the prevention and abatement of pollution arising from waste discharge.

### II. DESCRIPTION OF SAMPLING STATIONS AND SCHEDULE OF SAMPLING, ANALYSES AND OBSERVATIONS

The following sampling and observations will be required until the leachfield is abandoned.

- A. Monthly, observations of the two main septic tanks, sewer lines crossing the beach, and beach leachfield for evidence of surfacing wastewater, septic tank overflow, broken/exposed sewer line, and odors. The above observations should also be made immediately after significant rainfall.
- B. Monthly, sampling for total coliform, fecal coliform, and fecal streptococci at two locations, one at either end of Rodeo Lagoon in the vicinity of potential septic tank overflows. The ratio of fecal coliform to fecal streptococci should also be calculated.

### III. REPORTS TO BE FILED WITH THE REGIONAL BOARD

#### 1. Violations of Requirements

In the event the discharger is unable to comply with the conditions of the waste discharge requirements and prohibitions due to:

- (a) maintenance work, power failures, or breakdown of waste treatment equipment, or
- (b) bypassing of untreated or partially treated wastewater, or
- (c) accidents caused by human error or negligence or,
- (d) other causes such as acts of nature,

the discharger shall notify the Regional Board office by telephone at (415) 464-1255 as soon as he or his agents have knowledge of the incident and confirm this notification in writing within two weeks of the telephone notification. The written report shall include pertinent information explaining reasons for the non-compliance and shall indicate what steps were taken to prevent the problem from recurring.

### 3. Self-Monitoring Reports

Written reports shall be filed regularly for each calendar quarter and submitted by the fifteenth day of the following month, pending abandonment of the leachfield system. The reports shall be comprised of the following:

#### a. Letter of Transmittal:

A letter transmitting self-monitoring reports should accompany each report. Such a letter shall include a discussion of requirement violations found during the past months and actions taken or planned for correcting violations, such as operation modifications. Monitoring reports and the letter transmitting reports shall be signed by a responsible official. The letter shall contain a statement by the official, under penalty of perjury, that to the best of the signer's knowledge the report is true and correct.

#### b. Data Results


All results observed or analyzed in II, including dates and times of sampling and/or observations.

c. Map:

A map shall accompany the report showing sampling and observation station locations.

I, Roger B. James, Executive Officer, hereby certify that the foregoing Self-Monitoring Program:

1. Has been developed in accordance with the procedure set forth in this Regional Board's Resolution No. 73-16 in order to obtain data and document compliance with waste discharge requirements established in Regional Board Order No. 85-75.
2. Is effective on the date shown below.
3. May be reviewed at any time subsequent to the effective date upon written notice from the Executive Officer or request from the discharger, and revisions will be ordered by the Executive Officer.

A handwritten signature in cursive script, appearing to read "Laurence P. Kelly". Below the signature, the word "for" is written in a small, handwritten font.

ROGER B. JAMES  
Executive Officer

Effective Date June 19, 1985